

DEFENDANT'S CONSTRUCTIONS & EVIDENCE
EXHIBIT B

	Claim 1 limitation	Construction	Evidence
pre	1. An automatic data processing system for processing business and financial transactions between entities from remote sites which comprises:	The claimed automatic data processing system uses “interactive video branching,” <i>infra</i> . Business and financial transactions = loan processing.	'319 Prosecution History (“PH”), 12/6/2012, at 7 (90/012,641); 9/22/1995 Reply, at 9. 7,010,508 PH, 9/25/2000 Decision On Appeal, FN1; '319 PH, 12/6/2012 (90/012,641), at 24. '319 PH, 7/12/1996 Appeal Brief, at 4, 5-6. '319, 1:17-2:9.
Central Processor			
1a	a central processor programmed and connected to process a variety of inquiries and orders transmitted from said remote sites;	the financial institution's processor	'319 PH, 12/18/1996 Reply Brief, at 2. FIG 1. '319, 2:27-30, 3:23-24, The declarations of Scott Hanselman. Dkt. Nos. 103, 107, 111, and exhibits thereto.
1b	said central processor including:		
1c	means for receiving information about said transactions from said remote sites;	Means plus function limitation (“MPF”) function: to enable the central processor to receive	'319 PH, 3/11/1996 Amendment, at 5. '319 PH, 7/12/1996 Appeal Brief, at 4, 6-7. '319, 4:21-26.

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		information from the remote sites. Corresponding structure/Construction = Dial up modem and telephone lines and their equivalents.	The declarations of Scott Hanselman. Dkt. Nos. 103, 107, 111, and exhibits thereto.
1d	means for retrievably storing said information;		
1e	at least one terminal at each of said remote sites including a data processor and operational sequencing lists of program instructions;	a kiosk or self-service terminal with all of the features depicted in Figure 2.	'319, FIG 2, Abstract, 1:16-22, 1:34-41, 2:25, 3:30-65. CBM2014-00025, May 20, 2014 Institution Decision, at 14. 4,359,631, Abstract, FIGS 1-5, 1:36-37, 2:7-14, 2:38-41. 4,300,040, FIG 1, 1:5-7, 1:36-2:19, 3:26-44. '391 PH, 3/11/1996 Amendment, at 15-16. Extrinsic evidence: Landmark's Opp to MTD, <i>Shar Products</i> , No. 2:18-cv-11792, Dkt. No. 15, at 23:2-10. The declarations of Scott Hanselman. Dkt. Nos. 103, 107, 111, and exhibits thereto.
1f	means for remotely linking said terminal to said central processor and for transmitting	MPF	'319 PH, 3/11/1996 Amendment, at 5. '319 PH, 7/12/1996 Appeal Brief, at 4, 6-7.

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	Claim 1 limitation	Construction	Evidence
	data back and forth between said central processor and said terminal;	Function: transmitting data back and forth between said central processor and said terminal; Corresponding structure/Construction = Dial up modem and telephone lines	'319, 4:21-26. The declarations of Scott Hanselman. Dkt. Nos. 103, 107, 111, and exhibits thereto.
Terminal			
1g	said terminal further comprising means for dispensing information and services for at least one of said entities including:		
1h	a video screen;	A screen showing interactive video	'319 PH, 12/6/2012, at 7, 9 (90/012,641); 9/22/1995 Reply (<i>passim</i>). <i>Id.</i> , at 15 '319 PH, 3/11/1996 Amendment, at 6. '319 PH, 7/12/1996 Appeal Brief, at 4, 5-6, 8. '319 PH, 7/12/1996 Appeal Brief, at 12. '319 PH, 90/00,6623, 7/20/2005 Amendment, at 11. '319, 3:50-54, 4:3-6. Extrinsic evidence: Complaint, ¶8. Maitra Decl, Dkt. No. 1-4, at

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			¶¶11-13, 17 Landmark's Opp to MTD, <i>Shar Products</i> , No. 2:18-cv-11792, Dkt. No. 15, at 11:7-9, 23:2-10. Complaint, <i>Shar Products</i> , Dkt. No. 1, at 7, The declarations of Scott Hanselman. Dkt. Nos. 103, 107, 111, and exhibits thereto.
1i	means for holding operational data including programing, informing, and inquiring sequences of data;	MPF Function: storing operational data. Corresponding structure/construction = videodisc and its equivalents	'319 PH, 3/11/1996 Amendment, at 1, 3. '319 PH, 7/12/1996 Appeal Brief, at 4, 5-6. '319 PH, 12/18/1996 Reply Brief, at 6. The declarations of Scott Hanselman. Dkt. Nos. 103, 107, 111, and exhibits thereto.
1j	means for manually entering information;	MPF Function: allow the applicant to enter information manually into the kiosk. Corresponding structures/construction = keyboard or touchpad. [Azure Farms withdrew its proposed construction for touchpad by agreement between the Parties]	'319, FIG 12, 3:56-58, 4:10-13. The declarations of Scott Hanselman. Dkt. Nos. 103, 107, 111, and exhibits thereto.

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1k	means for storing information , [inquires] <i>inquiries</i> and orders for said transactions entered by one of said entities via said means for manually entering information, and data received through and from said central processor;	MPF Function: storing inputs from the loan applicant via the keyboard or touchpad Corresponding structure/construction = videodisc and its equivalents	'319 PH, 7/12/1996 Appeal Brief, at 4. '319, Abstract, 3:34-39. The declarations of Scott Hanselman. Dkt. Nos. 103, 107, 111, and exhibits thereto.
1l	on-line means for transmitting said information, inquiries, and orders to said central processor;	MPF Function: transmitting orders from the terminal to the central processor at the financial institution. Corresponding structure/construction = dial up modem and telephone lines	'319 PH, 3/11/1996 Amendment, at 5. '319 PH, 7/12/1996 Appeal Brief, at 4, 6-7. '319, 4:21-26. The declarations of Scott Hanselman. Dkt. Nos. 103, 107, 111, and exhibits thereto.
1m	on-line means for receiving data comprising operator-selected information and orders from said central processor via said linking means;	MPF Function: receiving data from the central processor at the financial institution via "said linking means". Said linking means are the linking means of limitation 1(f) ("means for remotely linking said terminal to said central processor") Both 1(f) and 1(m) have the same "linking means"; <i>i.e.</i> , a dial up modem and telephone lines.	'319 PH, 3/11/1996 Amendment, at 5. '319 PH, 7/12/1996 Appeal Brief, at 4, 6-7. '319, 4:21-26. The declarations of Scott Hanselman. Dkt. Nos. 103, 107, 111, and exhibits thereto.

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		Corresponding structure/construction = dial up modem and telephone lines	
1n	means for outputting said informing and inquiring sequences on said video screen in accordance with preset routines and in response to data entered through said means for entering information;	<p>MPF</p> <p>Function: to provide a way for the terminal to output informing and inquiring sequences, <i>i.e.</i>, to deliver information and ask questions of the applicant.</p> <p>Corresponding structure/construction = interactive video of live fictitious loan officer and its equivalents.</p> <p>Means for entering = keyboard or touchpad.</p>	<p>'319 PH, 12/6/2012, at 7, 9 (90/012,641); 9/22/1995 Reply (<i>passim</i>).</p> <p><i>Id.</i>, at 15</p> <p>'319 PH, 3/11/1996 Amendment, at 6.</p> <p>'319 PH, 7/12/1996 Appeal Brief, at 4, 5-6, 8.</p> <p>'319 PH, 7/12/1996 Appeal Brief, at 12.</p> <p>'319 PH, 90/00,6623, 7/20/2005 Amendment, at 11.</p> <p>'319, 3:50-54,</p> <p>'319, 3:56-58, 4:10-13.</p> <p>The declarations of Scott Hanselman. Dkt. Nos. 103, 107, 111, and exhibits thereto.</p> <p>See above.</p>

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1o	means for controlling said means for storing, means for outputting, and means for transmitting, including means for fetching additional inquiring sequences in response to a plurality of said data entered through said means for entering and in response to information received from said central processor;	MPF indefinite	CBM2014-00025, May 20, 2014 Institution Decision, at 12-22. '319 PH, 12/6/2012 (90/012,641), at 12-15. '319 PH, 3/11/1996 Amendment, at 7-8. '319 PH, 7/12/1996 Appeal Brief, at 4, 9-12, 26. '319 PH, 12/18/1996 Reply Brief, at 3. '319 PH, 90/00,6623, 7/20/2005 Amendment, at 6-7, 10. The declarations of Scott Hanselman. Dkt. Nos. 103, 107, 111, and exhibits thereto.
1p	said informing sequences including directions for operating said terminal, and for presenting interrelated segments of said operational data describing a plurality of transaction operations;	MPF (because the "said informing sequences are from limitation 1(n) which is a MPF limitation) Function: to provide information to the applicant, including directions for how to operate the terminal. Corresponding structure/construction = sequences including directions from the fictitious loan officer [for operating said terminal]	'319 PH, 12/6/2012 (90/012,641), at 16. '319 PH, 3/11/1996 Amendment, at 8-9. '319 PH, 7/12/1996 Appeal Brief, at 4, 12. '319 PH, 9/27/2000 Decision, at 6.

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1q	said programming sequences including means for interactively controlling the operation of said video screen, data receiving and transmitting means; and for selectively retrieving said data from said means for storing;	MPF Indefinite.	'319 PH, 12/6/2012 (90/012,641), at 9, 12. '319 PH, 3/11/1996 Amendment, at 9-10. '319 PH, 7/12/1996 Appeal Brief, at 4, 13. The declarations of Scott Hanselman. Dkt. Nos. 103, 107, 111, and exhibits thereto.
1r	said means for storing comprising means for retaining said operational sequencing list and means responsive to the status of the various means for controlling their operation;		
Central Processor, cont...			
1s	said central processor further including:		
1t	means responsive to data received from one of said terminals for immediately transmitting selected stored information to said terminal; and		
1u	means responsive to an order received from a terminal for updating data in said means for storing;		
System			
1v	whereby said system can be used by said entities, each using one of said terminals to exchange information, and to respond to inquiries and orders instantaneously and over a period of time.		